

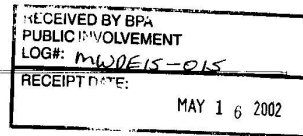
Kuehn, Ginny -KC-7

From: Dan/Barb Sisk [dbsisk@earthlink.net]

Sent: Wednesday, May 15, 2002 5:48 PM

To: comments@bpa.gov

Subject: Opposing Washington Winds Rattlesnake Mountain Wind Farm

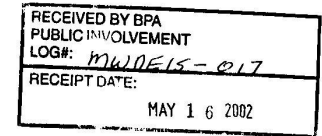


I oppose the development of the Washington Winds Wind Farm on Rattlesnake Mountain. This development will be destructive to the unique and fragile environs of the Rattlesnake ridge.

Daniel R. Sisk
Registered Voter
Richland, WA
Benton County

May 15, 2002

Bonneville Power Administration
Public Affairs Department KC-7
P.O. Box 12999
Portland, OR 97212



Ref: Maiden wind Farm Draft Environmental Impact Statement

To the Administrator:

Thank you for providing The Nature Conservancy (The Conservancy) this opportunity to comment on the proposed action described in the above referenced document. The proposal clearly states the purpose for the project and distinguishes between the action and No Action alternatives. The legislative and market contexts for the project are also clearly set forth. The Conservancy has a regional presence in the area of the proposed action, brought about by the high biodiversity conservation needs determined through research and planning conducted over the last decade, described more fully below.

Introduction and Background

Key areas of interest to us in the proposed project area include the Hanford Reach National Monument and the Yakima Training Center. The Conservancy's identification of these priority areas comes in part from the Conservancy's Columbia Plateau Ecoregional assessment process. Based upon principles of conservation biology, our planning model yields a set of conservation areas representing biological diversity at varying biological and spatial scales. In addition to the Hanford Monument and Yakima Training Center, other private and federal ownerships harboring significant sources of remnant high quality plant communities are found within and in the vicinity of the proposed project.

In 1992 the U.S. Department of Energy (DOE) and the Conservancy entered into a Memorandum of Understanding that called for a cooperative and coordinated inventory of plants, animals and ecologically significant areas at Hanford. This study is noteworthy in its discovery of plant and insect species new to science. The following excerpt from the executive summary underscores the importance of this area within the Columbia Plateau ecoregion (*Biodiversity Inventory and Analysis of the Hanford Site*, TNC: 1999):

Findings from the biodiversity inventory clearly demonstrate that the Hanford Site, including the Hanford Reach, is home to a spectacular, unduplicated and irreplaceable natural legacy. Within its mosaic of habitats, Hanford supports a wealth of relatively unaltered and increasingly uncommon native plant communities, the size and diversity of which is unmatched in the Columbia Basin. Not surprisingly, significant numbers of plants, insects, amphibians, reptiles, birds, and mammals, many of which are rare or declining in Washington, were found to be associated with or dependent on these habitats. In its present condition the Hanford Site is not only a refuge, but also a genetic bank for both the common and rare plants and animals that are integral components of the

shrub-steppe and Columbia River ecosystems. From a conservation standpoint, the Hanford Site is a vital—and perhaps the single most important—link in preserving and sustaining the diverse plants and animals of the Columbia Basin Ecoregion.

The Yakima Training center is also a conservation priority for the Conservancy, within the constraints imposed by the mission needs of the Department of Defense. The Conservancy's report titled *Identifying and Preserving Biodiversity on a Regional Scale, the Role of the Yakima Training Center in Conserving Biodiversity in the Shrub-Steppe of Washington* (TNC, 1999) states that

The YTC supports over 100,000 acres of high quality, native plant communities in seven major habitat types and more than 30 major cover types. Although many of these types are represented to a lesser degree on other public lands, the extent at the YTC of contiguous high quality, low elevation big sagebrush...is unique and of regional importance. The YTC supports 21 of the 77 rare plant taxa currently known in the region...Three taxa found on the YTC are not known elsewhere in Washington...

Comments

Given the exhaustively documented value of the region's remnant shrub-steppe environment, we would like to raise several points that emerge from the DEIS:

1. The DEIS contains cumulative impact analysis to site level impacts (pg 3-139, Para 3.17), a position that is not warranted given the stated need to produce a regional renewable power source, together with its transmission infrastructure (pg 1-4, para 1.2.3).
2. The lack of a regional cumulative impact analysis leads directly to the proposed site level impact mitigation strategy. Based on the Conservancy's research cited above, and other research cited in the DEIS, fragmentation of critical shrub-steppe matrix by conversion to development, and loss to introduction of invasive species requires mitigation at a sufficient scale. By not acknowledging the cumulative regional impact of other wind power proposals and transmission line facilities projects, the replacement actions will occur in an uncoordinated, piecemeal fashion. The end result of project-scale mitigation projects will be a fragmented patchwork of disjunct areas that will not serve as a functional landscape. In order for the remnant regional shrub-steppe matrix to function, large areas that still support ecosystem processes need to be conserved.
3. It is not clear how many total acres will be used to calculate required mitigation credits. The mitigation plan seems to devolve, for final resolution of uncertainty, to Benton County (pg 3-29, para 3.3.4.2). This means that Benton County will be responsible for resolving the acquisition strategy for project mitigation. It seems prudent to retain other representatives from the Site Management Plan (SMP) Team for cases of dispute resolution concerning key elements of mitigation, including the final acquisition formula.
4. The responsibility for implementing the acquisition of replacement property is not spelled out in the document. It is the Conservancy's experience that acquisition of private lands, particularly in conservative, rural areas, can be a difficult and time consuming effort, requiring specialized skills and institutional infrastructure. Without a definite, funded plan to dedicate skilled staff to this part of the mitigation plan, it

will not be implemented. Given that possibility, what safeguards are offered against default of the mitigation plan? Although a monitor for the Site Management Plan is called for, what are the remedies for failure to act according to the SMP?

The comments given above point to the need to expand the Site Management Plan Team to include other professional stakeholders, to serve as an experts panel to develop an integrated mitigation plan. The need to address the potential to secure critical, meaningful habitat to offset other project impacts, as well as impacts from the current project proposal, is evident and timely as we collectively face the challenge of meeting the power demands of an expanding human population.

Comments prepared and submitted by:

Elizabeth Bloomfield
South Central Washington Program Manager

Kuehn, Ginny -KC-7

From: Kathryn E Kaser [kkaserco@bossig.com]
Sent: Wednesday, May 15, 2002 10:53 AM
To: comment@bpa.gov
Subject: Wind power

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# <u>MWDEIS-018</u> RECEIPT DATE: MAY 16 2002

Please do not use taxpayer money (or ANY money) for wind power. It is not cost effective any way you look at it. This will destroy a great deal of wildlife habitat. It is not needed and the only benefit is to WA Winds' pocketbooks. Dale Nichols and Kathy Kaser, Kennewick, WA

Kuehn, Ginny -KC-7

From: Cal [cal@futurelink.net]
Sent: Wednesday, May 15, 2002 3:31 PM
To: comment@bpa.gov
Subject: Wind Machines for power generation

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG# <u>MWDEIS-019</u> RECEIPT DATE: MAY 16 2002

Dear Sirs: I read In the Tri-City Herald newspaper this morning that you are planning to construct hundreds of wind machines on our Rattlesnake Range of hills. I wish to voice my opinion as follows.....NO! I am an Electrical Engineer; professional registration in this state (Wash.) since the 1950's. I have an Electrical Engineering degree from the University of Southern California (1951). I spent 15 years doing electrical design/development for General Electric Co., and 15 years as F Reactor Plant Electrical Engineer, and manager of major electrical maintenance/construction for the combined reactor plant complex at Hanford. I am of the opinion that wind power can only make a trivial contribution to the grid. Looking to the future, say 10 or 100 or 1000 or 10,000 or ad infinitum years "down the pike" only water power and nuclear can accomplish the task. The Rattlesnake Range is about 15 miles due north of my retirement residence and very visible. I would hate to see the view compromised. Lastly, the cost for operation and maintenance surely would be fantastic compared to hydro and nuclear. Think about it, as they say. Respectfully, C. A. Simsen

Maiden Wind Farm

Telephone comment by Ginny Kuehn
5/16/02

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MWDEIS-020 RECEIPT DATE: MAY 16 2002
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NO NAME

I just saw this thing in the newspaper about public comment on the BPA project concerning the windmills on Rattlesnake Mountain. I think it is a jug. I think it should be denied. A waste of our taxpayer money. I am sure that a lot of other people knew all the goings on they would be calling also.

Maiden Wind Farm

Telephone comment by Ginny Kuehn
5/16/02

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MWDEIS-021 RECEIPT DATE: MAY 16 2002
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Donna Crawford

(509) 786-2036

It would be a crime to disturb that pristine area. It is very beautiful and we need to leave it for nature and environment and all the animals.

Maiden Wind Farm

Telephone comment by Ginny Kuehn
5/16/02

David Jepson
Richland, WA

I am using BPA power. I find it quite distressing that we are going into wind power where we get the federal government subsidies and we are not running a profitable project here. I am not sure why our money and rates are going up and we are spending it on projects like this. As a taxpayer and electric power user I think I am taken advantage of and appreciate it if there would be some consideration for rate payers and stop the project from going forward. Thank you.

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MWDEIS-022 RECEIPT DATE: MAY 16 2002



IN REPLY REFER TO:

ER 02/304

Lauri J. Croff
Communications
Bonneville Power Administration-KC-7
P.O. Box 12999
Portland, OR 97212

Dear Ms. Croff,

The Department of the Interior reviewed the Draft Environmental Impact Statement for the Construction of Maiden Wind Farm to Generate Up to 494 MW of Electricity in Benton and Yakima County, Washington. The Department does not have any comments to offer.

We appreciated the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Preston A. Sleeper".

Preston A. Sleeper
Regional Environmental Officer

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
500 NE Multnomah Street, Suite 356
Portland, Oregon 97232-2036

May 13, 2002

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MWDEIS-023 RECEIPT DATE: MAY 16 2002

5-12-02

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: MW0E15-024 RECEIPT DATE: MAY 16 2002

John and Joanne Porter
167304 W 226 PR SW
Prosser, Wa. 99350

BPA communications KC-7

We wish to go on record as being against the Maiden Wind farm project. This project will cause environmental harm to the area. As you know the land as is now is pretty much unmolested from development and sprawl. All the roads, gravel pits, transmission lines, structures, will destroy this quiet, unique area. I realize BPA is under pressure to develop "green power", but please do it somewhere that is already developed, like Horse Heaven. Rattlesnake is not that windy (I grew up on Rattlesnake) and this project is such a waste of taxpayer money. The tax subsidy of this project is wrong and causes great harm to the area.

Thank you,

Joanne Anderson Porter

Enclosed is a letter I wrote to the editor of area newspapers.

Dear Editor,

Very soon it's almost certain that tremendous changes will be taking place on the Rattlesnake Hills, between State Route 241-, in Yakima County and Crosby road in Benton County. The corporation, Washington Winds, Inc. Has leased land from private landowners and plan to install approximately 549 wind machines across the ridge of Rattlesnake and also spread these machines out on lower elevations across Rattlesnake. Transmissions lines will be built to connect these wind towers along with maintenance and operational buildings. Electrical substations also would be installed. Several articles have been printed in the Yakima Herald in the past 10 months, concerning the "Maiden Wind Farm Project"; these articles basically painted a positive picture of this project and failed to tell the whole story. As the Rattlesnake Hills are now, you will find a vast area essentially in its natural state, with its wildlife, vegetation and natural springs that serve these animals. The ranchers have a few 2-track ranch roads that they use to check on the livestock that are thinly spread out over the hill. They have been good stewards of the land and the land with its native inhabitants have remained pretty much unmolested by development and sprawl. The development of this wind farm will demand that up to 44 miles of new roads be build to accommodate the heavy construction equipment and machinery. To build these roads, two quarry pits will need to be developed to provide the gravel and rock. These invasive roads will forever scar the land and be visible for miles. They will put people, trucks & bulldozers across miles of hillside, lower elevation prairie, across canyons and around springs. The wind machines will be approximately 325 to 390 feet high. The destructive effect on this unique land and its wildlife is distressing in itself but if this wind power project made good economic sense and there was a need for it, perhaps we could justify the building of this project, unfortunately it does not even come close. Please examine the following facts that have not been given to the public.

Maiden Wind Farm will be funded with a power sales contract from Bonneville Power Administration (BPA). The project owner, Washington Winds will receive a federal tax subsidy funded by all the rest of us. Bonneville Power Administration under pressure to provide, "green power" will be and is using ratepayer dollars to pay for this project. None of us know when the wind will blow so this type of a generation resource is not reliable, schedulable or of much actual value. This project will only generate approximately 1/3 of the time so the value of the generation is far less than other types of resources such as combustion turbines and hydro projects. In fact, without the federal tax subsidy of \$.015 per kwh wind projects on their own, without subsidies, would not be developed. BPA at this point in time has a lot of surplus power so the generation produced at this project and others like it is a waste of rate payer's money as will as federal tax dollars. Without subsidies these projects cannot survive. BPA will pay approximately .035 per kwh to Washington Wind Corp, whereas today BPA would sell non firm power on the open market for close to nothing. In other words there is very little value in non-reliable energy resources. We as consumers of electricity will lose.

It should be remembered that the wind does not always blow, nor can anyone tell the wind when to blow, in fact Bonneville acknowledges that only in a small area of the gap in Rattlesnake along State Route 241, is the wind consistent enough to generate acceptable power output. The Rattlesnake Hills are just not that windy.

In short this just another corporation looking for a deep pocket, yours and mine. Another fleecing of the American public. BPA is accepting public comment up until May 15, 2002. Please contact BPA Communications, KC-7, P.O. Box 12999, Portland, OR, 97212 or comment@bpa.gov or call toll free at 1-800-622-4519 and record your comments. Also you can contact the Benton County Planning Dept. P.O. Box 910, Prosser, Wa 99350 or mike.shuttleworth@co.benton.wa.us